

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

**FEE APPLICATION COVER SHEET FOR THE
PERIOD JUNE 1, 2022 THROUGH JUNE 30, 2022**

Debtor: LTL Management LLC

Applicant: Taurig Law LLC

Case No.: 21-30589-MBK

Client: Counsel to Robert J. Keach, Esq.,
(the "Fee Examiner")

Chapter: 11

Case Filed: October 14, 2021 (the "Petition
Date")

**SECTION 1
FEE SUMMARY**

☒ Monthly Fee Application No. 3 or ☐ Final Fee Application

Summary of Amounts Requested for the Period from June 1, 2022 through June 30, 2022 (the "Third Statement Period").

Total Fees:	\$	2,635.00
Total Disbursements:	\$	50.00
Total Fees Plus Disbursements:	\$	2,685.00
Minus 20% Holdback of Fees:	\$	527.00
Amount Sought at this Time:	\$	2,158.00

	<u>FEEES</u>	<u>EXPENSES</u>
Total Previous Fees Requested:	<u>\$7,310.00</u>	<u>\$0.00</u>
Total Fees Allowed to Date:	<u>\$0.00</u>	<u>\$0.00</u>
Total Retainer (If Applicable):	<u>\$0.00</u>	<u>\$0.00</u>
Total Holdback (If Applicable):	<u>\$1,462.00</u>	<u>\$0.00</u>
Total Received by Applicant:	<u>\$5,848.00</u>	<u>\$0.00</u>

COMPENSATION BY: PROFESSIONAL
JUNE 1, 2022 THROUGH JUNE 30, 2022

The attorney(s) who rendered professional services in this chapter 11 case from June 1, 2022 through June 30, 2022 are:

Name of Professional: Partner/Member	Year Admitted	Hourly Rate	Total Hours Billed	Total Fees
Jeffrey Taurig	1997	\$425.00	6.2	\$ 2,635.00

The total fees for the Third Statement Period are:

Professionals	Blended Rate	Total Hours Billed	Total Fees
Partner/Member:	\$425.00	6.2	\$ 2,635.00
Blended Attorney Rate:	\$425.00	6.2	\$ 2,635.00
Blended Rate for All Timekeepers:	\$425.00	6.2	\$ 2,635.00
Total Fees Incurred:		6.2	\$ 2,635.00

**SECTION II
SUMMARY OF SERVICES**

**COMPENSATION BY WORK TASK CODE FOR SERVICES RENDERED BY
TRAURIG LAW LLC
FOR THE PERIOD JUNE 1, 2022 THROUGH JUNE 30, 2022**

DESCRIPTION	HOURS	AMOUNT
Case Administration/General	N/A	N/A
Employment and Fee Applications	1.8	\$ 765.00
Employment and Fee Reports/Objections	4.4	\$ 1,870.00
Total Fees Requested	6.2	\$ 2,635.00

**SECTION III
SUMMARY OF DISBURSEMENTS**

**DISBURSEMENT SUMMARY BY TRAURIG LAW LLC
FOR THE PERIOD JUNE 1, 2022 THROUGH JUNE 30, 2022**

DISBURSEMENTS	AMOUNT
CourtSolutions	\$ 50.00
DISBURSEMENTS TOTALS	\$ 50.00

SECTION IV CASE HISTORY

- | | |
|--|--|
| (1) Date cases filed: | October 14, 2021 |
| (2) Chapter under which case commenced: | Chapter 11 |
| (3) Date of retention order: | April 5, 2022 [Dkt. 1966] (the “ <u>Retention Order</u> ”). ¹ |
| (4) Summarize in brief the benefits to the estate and attach supplements as needed | SEE BELOW |

During the Third Statement Period, Taurig Law LLC (“Taurig Law”) provided the following services to Robert J. Keach, the Fee Examiner, including, but not limited to, the following:

Employment and Fee Applications

- Drafted monthly fee statement for Taurig Law; coordinate with Bernstein, Shur, Sawyer & Nelson, P.A. (“BSSN”) re BSSN and Fee Examiner monthly fee statement and interim compensation order; review and file monthly fee statements, CNO’s and certificate of service for Taurig Law, BSSN and Fee Examiner.

Employment and Fee Reports/Objections

- Review, comment and file Fee Examiner statement in connection with Houlihan Lokey retention.
- Review filings related to interim fee applications and coordinate with BSSN and Fee Examiner in connection with same.
- Attend June 14, 2022 omnibus hearing on Fee Examiner’s final report for the first interim period.
- Reviewed and filed Fee Examiner first final report for interim fee applications for adjourned professionals.

¹ The Retention Order is attached hereto as Exhibit A

(5) Anticipated distribution to creditors:

(a) Administration expense:	Unknown at this time.
(b) Secured creditors:	Unknown at this time.
(c) Priority creditors:	Unknown at this time.
(d) General unsecured creditors:	Unknown at this time.

(6) Final disposition of case and percentage of dividend paid to creditors

Final dividend percentages are unknown at this time.

I certify under penalty of perjury that the above is true.

Date: July 21, 2022

/s/ Jeffrey Traurig
Jeffrey Traurig

EXHIBIT A

Retention Order



Order Filed on April 5, 2022
by Clerk
U.S. Bankruptcy Court
District of New Jersey

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

Jeffrey Traurig
TRAURIG LAW LLC
One University Plaza, Suite 124
Hackensack, NJ 07601
Tel: (646) 974-8650
E-mail: jtraurig@trauriglawn.com
Proposed Local Counsel to the Fee Examiner

In Re:

LTL MANAGEMENT LLC,

Debtor

Case No.: 21-30589 (MBK)

Judge: Michael B. Kaplan

Chapter 11

**ORDER AUTHORIZING RETENTION OF TRAURIG LAW LLC
AS COUNSEL TO THE FEE EXAMINER**

The relief set forth on the following page two (2) and three (3) is hereby **ORDERED**.

DATED: April 5, 2022


Honorable Michael B. Kaplan
United States Bankruptcy Judge

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LTL MANAGEMENT LLC

Chapter 11, Case No.: 21-30589 (MBK)

Order Authorizing Retention of Traurig Law LLC As Counsel To The Fee Examiner

Upon the applicant's, Robert J. Keach (the "Fee Examiner"), request for authorization to retain Traurig Law LLC ("Traurig") as counsel to the Fee Examiner, it is hereby **ORDERED**:

1. The Fee Examiner is authorized to retain Traurig in the professional capacity noted in the Application.

The professional's address is: Traurig Law LLC
One University Plaza, Suite 124
Hackensack, NJ 07601

2. As provided in the *Order Appointing an Independent Fee Examiner and Establishing Procedures* [Docket No. 1922, ¶ 13], the "fees and expenses of the Fee Examiner, and any counsel retained pursuant to court order, shall be subject to application and review pursuant to section 330 of the Bankruptcy Code, Bankruptcy Rule 2016, Local Bankruptcy Rule 2016-1, the U.S. Trustee Guidelines, and the Interim Compensation Order, and shall be paid from the Debtor's estate as an administrative expense under section 503(b)(2) of the Bankruptcy Code. The Fee Examiner's expenses and those of any counsel retained pursuant to court order, shall be subject to the information detail requirements set forth in D.N.J. LBR 2016-1."

3. If the professional requested a waiver as noted below, it is ☐ Granted ☐ Denied.

☐ Waiver, under D.N.J. LBR 2014-2(b), of the requirements of D.N.J. LBR 2016-1.

☐ Waiver, under D.N.J. LBR 2014-3, of the requirements of D.N.J. LBR 2016-1 in a chapter 13 case. Payment to the professional may only be made after satisfactory completion of services.

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LTL MANAGEMENT LLC

Chapter 11, Case No.: 21-30589 (MBK)

Order Authorizing Retention of Traurig Law LLC As Counsel To The Fee Examiner

4. Traurig will only bill 50% for non-working travel and shall not seek the reimbursement of any fees or costs including attorney fees and costs, arising from the defense of any of Traurig's fee applications in this case.
5. Traurig will agree to make a reasonable effort to comply with the U.S. Trustee's requests for information and additional disclosures as set forth in the Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases Effective as of November 1, 2013 (the "U.S. Trustee Guidelines").
6. Traurig will use the billing and expense categories set forth in the US Trustee Guidelines (Exhibit D-1 "Summary of Compensation Requested by Project Category"), among other categories.
7. Traurig will provide any and all monthly fee statements, interim fee applications, and final fee tab applications in "LEDES" or other satisfactory format to the United States Trustee.
8. The effective date of retention is the date the application was filed with the Court.

EXHIBIT B

Invoice/Time Records

Taurig Law LLC

One University Plaza, Ste 124
Hackensack, NJ 07601

INVOICE

Robert J. Keach Fee Examiner -- LTL Management

Invoice 22029

Date	Jul 20, 2022
Terms	Court Order
Service Thru	Jun 30, 2022

In Reference To: LTL Management LLC (Fees)

Date	By	Services	Rate	Hours	Amount
Employment and Fee Applications					
06/09/2022	JT	Draft certificate of no objections for Taurig Law, BSSN and Fee Examiner, email with L. Boots on same (.3).	\$ 425.00	0.30	\$ 127.50
06/13/2022	JT	Review docket, revise Certificates of No Objection re Taurig Law, BSSN, Fee Examiner and file same (.2); emails with L. Boots, K. Quirk re filing CNOs and certificate of service and file same (.1).	\$ 425.00	0.30	\$ 127.50
06/17/2022	JT	Draft/prepare monthly fee statement for Taurig Law for May (.3).	\$ 425.00	0.30	\$ 127.50
06/22/2022	JT	Revise monthly fee statement for Taurig Law and email with L. Boots regarding filings of BSSN, Fee Examiner and Taurig Law monthly statements (.1).	\$ 425.00	0.10	\$ 42.50
06/27/2022	JT	Review BSSN and Fee Examiner fee statements and emails with K. Quirk regarding finalizing same (.1); finalize Taurig Law monthly fee statement for filing (.1); file BSSN, Fee Examiner and Taurig Law monthly fee statements (.2); emails with K. Quirk re service, COS, prepare and coordinate LEDES file to be sent to UST office, review email to service parties (.2); review certificate of service and file same regarding the monthly fee statements (.1).	\$ 425.00	0.70	\$ 297.50
06/29/2022	JT	Email to L. Boots regarding upcoming 1st interim fee application and coordination re same.	\$ 425.00	0.10	\$ 42.50
Employment and Fee Applications Total:				1.80	\$765.00

Employment and Fee Reports/Objections

Taurig Law LLC

One University Plaza, Ste 124
Hackensack, NJ 07601

INVOICE

Robert J. Keach Fee Examiner -- LTL Management

Invoice 22029

Date	Jul 20, 2022
Terms	Court Order
Service Thru	Jun 30, 2022

06/01/2022	JT	Review draft statement regarding Houlihan certification in support of retention, review interim order and certification in connection with same (.2); call with L. Boots, comment on statement and coordinate revisions (.2); review, revised statement regarding Houlihan and file same (.2); review service email from K. Quirk and review file certificate of service on same (.1).	\$ 425.00	0.70	\$ 297.50
06/08/2022	JT	Review Debtor's statement regarding Committee fee applications, email with L. Boots and R. Keach on same and re registering for upcoming hearing on interim fee applications; register for 6/14 hearing (.2).	\$ 425.00	0.20	\$ 85.00
06/09/2022	JT	Review Houlihan supplemental declaration and call with L. Boots re same and regarding upcoming hearing on interim fee applications (.2).	\$ 425.00	0.20	\$ 85.00
06/13/2022	JT	Review hearing agenda, filing by UST regarding Houlihan, email to L. Boots re 6/14 hearing (.1).	\$ 425.00	0.10	\$ 42.50
06/14/2022	JT	Attend hearing (via Courtsolutions and Zoom) on, among other matters, interim fee applications/trustee report (1.5); follow-up call with L. Boots re submission of order, status of fee examiner report for Cooley, Brown Rudnick and Rayburn (.1).	\$ 425.00	1.60	\$ 680.00
06/21/2022	JT	Review proposed report for Brown Rudnick and Rayburn (.3), proposed order (.1) and exhibits (.1); review/finalize report and exhibits for filing (.2); review/finalize proposed order for filing (.1); calls and emails with L. Boots re proposed report and revisions (.2); review further revisions from L. Boots (.1); file Fee Examiner report with exhibits re Brown Rudnick and Rayburn (.2); review and file certificate of service for same (.1).	\$ 425.00	1.40	\$ 595.00
06/27/2022	JT	Review email from L. Boots and Order regarding partial adjournment and Zoom procedures for 7/6 hearing (.1).	\$ 425.00	0.10	\$ 42.50
06/28/2022	JT	Email to chambers registering to participate in 7/6 hearing and follow-up email to L. Boots (.1).	\$ 425.00	0.10	\$ 42.50

Employment and Fee Reports/Objections Total: 4.40 \$1,870.00

Taurig Law LLC

One University Plaza, Ste 124
Hackensack, NJ 07601

INVOICE

Robert J. Keach Fee Examiner -- LTL Management

Invoice 22029

Date	Jul 20, 2022
Terms	Court Order
Service Thru	Jun 30, 2022

Total Fees Amount: 6.20 \$2,635.00

In Reference To: LTL Management LLC (Expenses)

Date	By	Expenses	Rate	Quantity	Amount
Court Call					
06/14/2022	JT	CourtSolutions	\$ 50.00	1.00	\$ 50.00
Court Call Total:					\$50.00
Total Expenses Amount:					\$50.00

Total Hours 6.20 hrs

Total Fees \$ 2,635.00

Total Expenses \$ 50.00

Total Invoice Amount \$ 2,685.00
